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Attorneys for EB-5 Plaintiffs

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re

1 MIN, LLC; HOTEL AT SOUTHPORT,
LLC; and TWELFTH FLOOR, LLC,

Debtors.

Chapter 11

Lead Case No. 24-01519

(Jointly Administered)

Adv. Proc. No. 25-80007

LAN CAI, SHUIE CHEN, TIANRAN
CHEN, WEIJUN CHEN, JIE CHU,
ZHAOJUN CONG, HE CUI, JIANYING
DING, JICHUN DU, QING DU, JIEYING
FENG, YUPENG GAO, YIRAN HAN,
JINYANG HU, NAIXIN HU, XIAO HUANG,
JUNMEI JIN, XIN MENG, WEIHONG LU,
YUANYUAN MA, MIN PAN, LEI PEI, HAO
QI, XIAO RONG, JUAN SHAO, HUI

**DECLARATION OF
MATTHEW J.
LIVINGSTON
IN SUPPORT OF
PLAINTIFFS' MOTION
FOR PROTECTIVE
ORDER**

DECLARATION OF MATTHEW J. LIVINGSTON IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PROTECTIVE ORDER


ARÊTE LAW GROUP
600 University St, Suite 2420
Seattle, WA 98101
Or: (206) 428-3250

1 WANG, JINGYI WANG, YUQUAN WANG,
2 ZIDONG WANG, RONGRONG WU,
3 ZHAOHUI XU, QI XU, JIE YAN, KE
4 YANG, QIN YANG, HONGYUN YU,
5 SHUXIAN ZENG, XIAOHONG ZHANG,
6 YING ZHAO, MINBO ZHOU, NAN ZHOU,
7 HUIQING ZHU, ZILING ZENG, LUYI
8 ZHANG, JUNDI LIANG, TAO LI, YUN CAI,
9 HONGLIANG TANG, JIE TANG,
10 WENLUNG CHEN, SHI ZHANG, JUN CHE,
11 DAHE ZHANG, SHAN WAN, XIAOHONG
12 SUN, YAN LYU A/K/A YAN LU, WENYAN
13 WANG, JIALIN TIAN, RUI TANG,
14 XINHAN LIN, SIYU LIU, JIANYING
15 MENG, PHUONG NGUYEN, YEQING PAN,
16 XUERONG QI, QIANG WANG, JUNLI
17 WEI, YUNFEI WU, HONGYING YU,
18 DONGLI ZHANG,

19 Plaintiffs,

20 v.

HOTEL AT SOUTHPORT, LLC, TWELFTH
FLOOR, LLC, 1 MIN, LLC.

Defendants,

and

WF CREL 2020 GRANTOR TRUST,

Intervenor-Defendant.

1 I, Matthew J. Livingston, declare as follows:

2 1. I am the attorney of record for each Plaintiff in the above-captioned
3 adversary proceeding.

4 2. Attached hereto are the following exhibits, which are accurate to the
5 best of my knowledge:

6 a. **Exhibit 1:** An example deposition notice for Plaintiff Dahe
7 Zhang, which is substantively identical (other than the time of
8 deposition) to the deposition notices sent to each Plaintiff by
9 Defendants in the above-captioned adversary proceeding.

10 b. **Exhibit 2:** A summary of all seventy (70) deposition notices sent
11 by Defendants to Plaintiffs in the above-captioned adversary
12 proceeding.

13 c. **Exhibit 3:** A summary of the current country-of-residence of
14 each Plaintiff in the above-captioned adversary proceeding.
15

16 I declare under penalty of perjury under the laws of the State of Washington
17 that the foregoing is true and correct.

18 Dated: April 22, 2025.

Respectfully submitted,

19 

20 Matthew J. Livingston Esq.
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New York, NY 10119
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DECLARATION OF MATTHEW J. LIVINGSTON IN
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Exhibit 1

DEPOSITION NOTICE OF PLAINTIFF DAHE ZHANG

DECLARATION OF MATTHEW J. LIVINGSTON IN
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EXHIBIT 2

Summary Table of Deposition Notices

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Exhibit 3

Current Country of Residence Information for All Plaintiffs

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